

AARON D. FORD  
 Attorney General  
 Steve Shevorski (Bar No. 8256)  
 Chief Litigation Counsel  
 Kiel B. Ireland (Bar No. 15368)  
 Deputy Solicitor General  
 Office of the Attorney General  
 555 E. Washington Ave, Ste. 3900  
 Las Vegas, NV 89101  
 (702) 486-3420 (phone)  
 (702) 486-3773 (fax)  
 sshevorski@ag.nv.gov  
 kireland@ag.nv.gov

*Attorneys for Sandy O’Laughlin,  
 in her official capacity as Commissioner of the  
 State of Nevada Department of Business and Industry,  
 Financial Institutions Division*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

AARGON AGENCY, INC., a Nevada corporation,  
 ACA INTERNATIONAL, a Minnesota non-profit  
 corporation; ALLIED COLLECTION SERVICES,  
 INC. a Nevada corporation; ASSETCARE, LLC, a  
 Texas limited liability company; BUSINESS AND  
 PROFESSIONAL COLLECTION SERVICE, INC.,  
 a Nevada corporation; CAPIO PARTNERS, LLC, a  
 Texas limited liability company; CF MEDICAL,  
 LLC, a Nevada limited liability company; CLARK  
 COUNTY COLLECTION SERVICE, LLC, a  
 Nevada limited liability company; COLLECTION  
 SERVICE OF NEVADA, a Nevada corporation;  
 DONNA ARMENTA, an individual; DONNA  
 ARMENTA LAW, a Nevada law firm; NEVADA  
 COLLECTORS ASSOCIATION, a Nevada non-  
 profit corporation, PLUSFOUR, INC., a Nevada  
 corporation; RM GALICIA d/b/a PROGRESSIVE  
 MANAGEMENT, LLC, a Nevada limited liability  
 company; and THE LAW OFFICES OF  
 MITCHELL D. BLUHM & ASSOCIATES, LLC, a  
 Georgia limited liability company,

Plaintiffs,

vs.

SANDY O’LAUGHLIN, in her capacity as  
 Commissioner of State of Nevada Department of  
 Business and Industry Financial Institutions  
 Division,

Defendant.

Case No. 2:21-cv-01202-RFB-BNW

**STIPULATION AND ORDER  
 TO CONTINUE TIME FOR REMAINING  
 BRIEFING ON CROSS-MOTIONS  
 FOR SUMMARY JUDGMENT  
 (THIRD REQUEST)**

1 The parties, through their respective counsel, agree and stipulate as follows:

2 1. Plaintiffs commenced this action on June 25, 2021 (ECF No. 1).

3 2. On September 16, 2021, this Court approved a Stipulated Discovery Plan and Scheduling  
4 Order (ECF No. 47) setting a deadline of April 6, 2022, for the parties to submit dispositive motions.

5 3. On April 5, 2022, the parties submitted a proposed Stipulation and Order Extending  
6 Deadline to File Dispositive Motions up to and including April 27, 2022 (ECF No. 73).

7 4. This Court issued an Order granting the proposed stipulation on April 6, 2022 (ECF No.  
8 74).

9 5. Defendant filed her Motion for Summary Judgment on April 27, 2022 (ECF Nos. 80 and  
10 81).

11 6. Plaintiffs filed their Motion for Summary Judgment on April 27, 2022 (ECF Nos. 82 and  
12 83).

13 7. This Court issued an Order granting the parties' proposed stipulation continuing the time  
14 for the remaining briefing on the Cross-Motions for Summary Judgment on May 31, 2022 (ECF No. 89).  
15 It ordered that the deadline for opposition briefs be continued to June 8, 2022, and the deadline for reply  
16 briefs be continued to June 21, 2022.

17 8. Defendant filed her Opposition to Plaintiffs' Motion for Summary Judgment on June 8,  
18 2022 (ECF No. 95).

19 9. Plaintiffs filed their Opposition to Defendant's Motion for Summary Judgment on June 8,  
20 2022 (ECF No.

21 10. The only remaining briefing is the parties' reply briefs, which are currently due June 21,  
22 2022.

23 11. The parties agree to extend by seven days, up to and including June 28, 2022, the deadline  
24 for filing their respective reply briefs.

25 12. This is the third request for an extension of these deadlines.

26 13. This stipulation is made in good faith and not to delay these proceedings.

27 The proposed briefing schedule has been agreed due to the press of work and upcoming deadlines  
28 of Defendant's counsel in *Brown v. S. Nev. Adult Mental Health Servs.*, No. A-14-706095-C (Nev. Eighth

Judicial Dist. Ct.) and *Coyote Springs Invest., LLC v. State*, No. A-20-820384-B (Nev. Eighth Judicial Dist. Ct.), as well as because the deputy attorney general responsible for Defendant's reply brief is recovering from COVID-19.

DATED this 20th day of June 2022.

DATED this 20th day of June 2022.

AARON D. FORD  
Attorney General

By: /s/Kiel B. Ireland  
Steve Shevorsi (Bar No. 8256)  
Chief Litigation Counsel  
Kiel B. Ireland (Bar No. 15368)  
Deputy Solicitor General  
Office of the Attorney General  
555 E. Washington Ave, Ste. 3900  
Las Vegas, NV 89101

*Attorneys for Defendant*

By: /s/Patrick J. Reilly  
Patrick J. Reilly, Esq.  
BROWNSTEIN HYATT  
FARBER SCHRECK, LLP  
100 North City Parkway, Suite 160  
Las Vegas, NV 89106-4614

*Attorneys for Plaintiffs*

DATED this 20th day of June 2022.

By: /s/David Israel  
David Israel, Esq. (*admitted pro hac vice*)  
SESSIONS ISRAEL SHARTLE, LLC  
3850 N. Causeway Boulevard, Suite 200  
Metairie, LA 70002-7227

James K. Schultz, Esq.  
SESSIONS ISRAEL & SHARTLE, LLC  
1545 Hotel Circle South, Suite 150  
San Diego, CA 92108-3426

*Attorneys for ACA International,  
AssetCare, LLC, Capio Partners, LLC,  
CF Medical, LLC, RM Galicia d/b/a  
Progressive Management, LLC, and  
The Law Offices of Mitchell D. Bluhm  
and Associates, LLC*

#### ORDER

**IT IS SO ORDERED.**

DATED this 21st day of June 2022.

  
\_\_\_\_\_  
RICHARD E. BOULWARE, II  
United States District Court